IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

GREGORY V. MANCO Ph.D.,

CIVIL ACTION

Plaintiff,

٧.

NO. 5:22-cv-00285-JLS

ST. JOSEPH'S UNIVERSITY, et al.,

Defendants. :

STIPULATION REGARDING SECOND AMENDED COMPLAINT

WHEREAS, Plaintiff filed a First Amended Complaint on August 24, 2022, with the permission of the Court (docs. 44 and 45);

WHEREAS, Defendants' responses to the First Amended Complaint are currently due on or around October 31, 2022;

WHEREAS, Plaintiff filed a Motion for Leave to Amend Complaint on October 13, 2022 (doc. 49); and

WHEREAS, the parties seek to proceed as efficiently as possible.

It is hereby stipulated by the parties, pursuant to Local Rule 7.4, as follows:

- 1. The Motion for Leave to Amend Complaint shall be granted as unopposed, with Defendants reserving all arguments for purposes of filing motions to dismiss some or all of the Second Amended Complaint.
- 2. Plaintiff shall file the Second Amended Complaint within 30 days of the date of this Order.
- 3. Defendant, Dr. Cheryl McConnell, shall be dismissed from Count X of the Second Amended Complaint based on tortious interference with contract.

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4. Defendants shall answer, move, or otherwise plead in response to the Second Amended Complaint within thirty (30) days of its filing.¹

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Attorneys for Defendant Dr. Susan Liebell

Dated: October 27, 2022

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Attorneys for Defendants, Saint Joseph's University & Dr. Cheryl McConnell

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Attorneys for Defendant Lynly Carman

¹ The 30-day time period takes into account the schedules and commitments of all counsel, including a pre-paid vacation of one of the defense counsel.

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BY THE COURT:

<u>/s/ Jeffrey L. Schmehl</u> Jeffrey L. Schmehl, J.